



February 21, 2025

Hon. Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)  
REQUEST TO EXTEND TIME FOR DEADLINES

Your Honor:

We represent the Plaintiffs in the above-referenced action. We write jointly with Defendants to ask for an extension of the upcoming deadlines. Plaintiffs' letter motion to amend the complaint is currently due February 28, 2025, with Defendants' response due March 14, 2025. Discovery is set to close on March 21, 2025. The parties jointly request this extension of time to allow the parties time to continue settlement discussions; we are getting closer but are still not there. This is the third request to extend deadlines. By Order of October 31, 2025, the Court granted the parties' previous joint request regarding discovery deadlines on the same day. [Dkt. 46]; the Court also granted the parties' previous requests regarding the motion to amend deadlines.

Event	Current	Proposal
Motion to Amend Complaint	2/28/25	3/21/25
Response to Motion to Amend	3/14/25	4/4/25
Fact Discovery Deadline	3/21/25	9/19/25
Completion of All Discovery	3/21/25	9/19/25
Joint status Report	3/21/25	9/19/25
Dispositive Motions	4/11/25	10/3/25
Proposed Joint Pre-Trial Order	sine die/TBD	sine die/TBD

Thank you for your consideration of these matters.

Sincerely,

A handwritten signature in black ink that reads "Penn Dodson". The signature is fluid and cursive, with the first name "Penn" and last name "Dodson" clearly visible.

Penn Dodson, Esq.

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